

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

DELTA PILOTS ASSOCIATION,	)	
	)	
Plaintiff	)	
	)	
v.	)	No. 1:14-cv-00225-AKH
	)	
JOHN DOE,	)	
	)	
Defendant.	)	
_____	)	

**THIRD DECLARATION OF MICHAEL HANSON**

I, Michael Hanson, declare as follows:

1. I am a pilot for Delta Airlines, Inc. (“Delta”) and am a member of the Air Line Pilots Association, International (“ALPA”). The Delta Master Executive Council (“MEC”) is ALPA’s highest local coordinating body at Delta. I am Vice Chairman of the MEC’s Strategic Planning Committee at Delta.

2. I have personal knowledge of the facts set forth in this Declaration. I offer this Declaration in support of ALPA’s Emergency Motion to Enforce the Court’s Protective Order of August 14-15, 2014.

3. Attached hereto as Exhibit 4 is a true and correct copy of an October 7, 2014 posting by Delta pilot Geoffrey Plouffe on the so-called "Chit Chat Forum" frequented by ALPA and DPA supporters. The forum is accessible by all Delta pilots, including those (like myself) who are not DPA members and who do not directly receive email communications from DPA. This post was a re-posting of the DPA Crew Van News of October 3, 2014, that was attached to my Second Declaration. Pilot Plouffe frequently has reposted such communications from DPA over the years on the Chit Chat Forum.

Pursuant to 29 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 22, 2014

By:   
Michael Hanson

# EXHIBIT 4

## Forum

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Author

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JustMyOpinion

Posted Oct 1

#1

Senior Member  
Registered: Oct 19, 2013  
Posts: 2,667

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DELTA PILOTS ASSOCIATION,  
Plaintiff, v.

JOHN DOE,  
Defendant.

### NOTICE OF DISMISSAL

Pursuant to Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure, the Plaintiff, Delta Pilots Association, hereby dismisses this action without prejudice.

No defendant has filed an answer to the complaint or a motion for summary judgment. Dismissal under Rule 41(a)(1)(A)(i) is therefore appropriate.

Dated: September 30, 2014

SEHAM, SEHAM, MELTZ & PETERSEN, LLP

By: /s/ Stanley J. Silverstone

Stanley J. Silverstone ssilverstone@ssmplaw.com

Lucas K. Middlebrook lmiddlebrook@ssmplaw.com

445 Hamilton Avenue, Suite 1204

White Plains, New York 10601

Tel: (914) 997-1346; Fax: (914) 997-7125

and

John Parker

Capt Kirk

Posted Oct 1

#2

Senior Member  
Registered: Nov 6, 2013  
Posts: 630

Winner: The lawyers

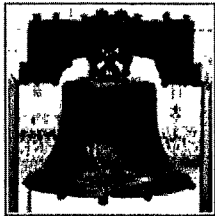
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Kirk Bacon  
LAX 7ER A

Geoffrey Plouffe

Posted Oct 7

#3



Senior Member  
Registered: Sept 27, 2013  
Posts: 7,872

### WEBSITE HACKING LAWSUIT UPDATE

On September 29th, DPA voluntarily dismissed the DPA vs JOHN DOE lawsuit in New York Federal Court. We have harvested a great deal of information and have pinpointed key players in the crime. We have offered several opportunities for those involved to take public responsibility and avoid what is about to happen. Those offers have been refused. Anyone directly involved may still contact the DPA Attorney if their intention is to cooperate. Now, we are moving forward with a new named lawsuit in the home state of one of the key players. Once entered into the public record, all will begin to learn the identities of those involved and what organization they may be affiliated with.

DPA regrets this course of action, but it is necessary to defend our legal right to pursue independent representation and hold those accountable who would break the law to interfere.

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Geoffrey Plouffe  
MSP 7ERB

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